

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
)
v.) C.A. 05-141 Erie
)
CATHERINE PEI)

**DEFENDANT'S MOTION TO EXTEND THE TIME
TO FILE A RESPONSE TO
GOVERNMENT'S MOTION TO ENFORCE JUDGMENT**

AND NOW, comes the defendant, CATHERINE PEI, by her attorney, Thomas W. Patton, Assistant Federal Public Defender, and respectfully moves this Honorable Court for an Extension of Time to File a Response to Government's Motion to Enforce Judgment, and in support thereof sets forth as follows:

1. The government filed a Motion to Enforce Judgment by Adjudicating Catherine Y. Pei in Contempt, and For Incarceration on November 10, 2005.
2. This Court ordered that a response to the Motion to Enforce Judgment be filed on or before November 29, 2005.
3. Counsel for Ms. Pei did not receive a copy of the court's order because his appearance was not on the docket. As such, counsel was unaware of the November 29, 2005 deadline for filing a response to the government's motion.
4. As such, counsel respectfully requests that this Honorable Court extend the time for the filing of the response to government's motion to enforce judgment to December 9, 2005.

WHEREFORE, defendant, Catherine Pei, respectfully requests an extension until December 9, 2005 to file a response to the government's motion.

Respectfully submitted,

/s/ Thomas W. Patton
Thomas W. Patton
Assistant Federal Public Defender
PA ID #88653